

## ***REMARKS***

Applicant thanks the Examiner for the considering the reference cited in the Information Disclosure Statement filed on October 20, 2003. Claims 1-29 are pending. Claims 27-29 are added by this Amendment. No new matter is included. Selected claims have been amended to further clarify the invention and not to overcome the cited art. In view of the foregoing amendments and the following comments, reconsideration and allowance of all the claims are respectfully requested.

### ***Claim Rejection Under 35 U.S.C. §102/§103***

Claims 1-8, 11, 12, 14-18, 20-21 and 23-25 stand rejected under 35 U.S.C. §102(a) as allegedly being anticipated by "HTML 4.0 Specification, W3C Recommendation" revised on April 24, 1998 (hereinafter "W3C"). Claims 9-10 and 22 stand rejected under 35 U.S.C. §103(a) as allegedly being obvious in view of W3C. Applicant traverses these rejections on the following basis.

Independent claim 1 recites, among other things, generating a file comprising structure information and content and enabling a document management file to present the electronic document by accessing the file having both the structure information and the content so that the document management file does not need to access more than one file to present the electronic document. Independent claims 16, 20, and 23 recite, among other things, generating a file comprising structure information, attribute information and content and enabling a document management file to present the electronic document by accessing the file having the structure information, the attribute information, and the content so that the document management file does not need to access more than one file to present the electronic document. The invention overcomes problems associated with requiring a user to create a plurality of files in order to present a single document having independently formatted regions and content within each of the independently formatted regions (see page 1, lines 20-22 and page 2, lines 7-9 of specification). For example, one benefit of the invention is that it enables

one call to a server to obtain the structure information, content and attribute information, whereas accessing multiple files requires making multiple calls to a server, which tends to be costly in terms of time and computing resources.

The Examiner relies on W3C for allegedly disclosing that the structure information and the content information are stored in the same file. However, W3C discloses that the structure information is stored in one file and the content is stored in separate content files that, by the Examiner's own admission, are accessed by the "src" attribute containing the URL that governs the content of the region. In particular, the frame document contains three "src" statements that call three *different* content files, including "contents\_of\_frame1.html", "contents\_of\_frame2.gif", and "contents\_of\_frame3.html" (see W3C page 193, bottom). Thus, W3C does not disclose that the structure information and the content information are stored in the same file.

In fact, W3C discloses that "the contents of a frame **must not be** in the same document as the frame's definition" (see W3C page 199, middle of the page). (**Emphasis added**). Thus, at best, W3C is merely an example of a frameset structured in the conventional manner described in the "Background of the Invention" section of specification, wherein users must create a plurality of files in order to present a single document having independently formattable regions and content for each of the frames in the frameset. Therefore, W3C is deficient at least because it does not disclose generating a file comprising structure information and content and enabling a document management file to present the electronic document by accessing the file having both the structure information and the content so that the document management file does not need to access more than one file to present the electronic document or generating a file comprising structure information, attribute information and content and enabling a document management file to present the electronic document by accessing the file having the structure information, the attribute information, and the content so that the document management file does not need to access more than one file to present the electronic document.

In view of the foregoing differences between independent claims 1, 16, 20, and 23 and the cited prior art, Applicant respectfully submits that claims 1, 16, 20, and 23

are allowable. Furthermore, dependent claims 2-6, 8-12, 14, 15, 17, 18, 21, 22, 24, and 25 are allowable at least by virtue of their dependency. Thus, reconsideration and allowance of these claims are requested.

Claims 13, 19, and 26 stand rejected under 35 U.S.C. §103(a) as allegedly being obvious over W3C in view of Fields et al. (U.S. Patent No. 6,128,655). Applicant traverses this rejection on the following basis.

Claim 13 depends indirectly from independent claims 1 and therefore includes the feature, among other things of generating a file comprising structure information and content and enabling a document management file to present the electronic document by accessing the file having both the structure information and the content so that the document management file does not need to access more than one file to present the electronic document. Claims 19 and 26 depend from independent claims 16, and 23, respectively, and therefore include the feature, among other things of generating a file comprising structure information, attribute information and content and enabling a document management file to present the electronic document by accessing the file having the structure information, the attribute information, and the content so that the document management file does not need to access more than one file to present the electronic document. As discussed above, W3C fails to disclose, teach, or suggest this feature.

The Examiner further acknowledges that W3C is deficient because it does not disclose translating the electronic document into a plurality of HTML documents (see page 7, paragraph number 11 of the Office Action of February 13, 2004). The Examiner relies on Fields for disclosing this feature. Fields discloses a method of reusing content from a variety of other content providers and adapting the content to the appearance of the hosting web site so that the content from the plurality of web sites appears native to the hosting web site (see Fields column 2, lines 44-50).

Even if Fields does teach translating the electronic document into a plurality of HTML documents; W3C and Fields, both alone and in combination, are still deficient, because, at a minimum, they do not teach or suggest generating a file comprising structure information and content and enabling a document management file to present

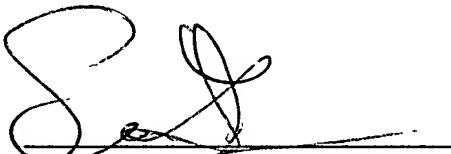
the electronic document by accessing the file having both the structure information and the content so that the document management file does not need to access more than one file to present the electronic document or generating a file comprising structure information, attribute information and content and enabling a document management file to present the electronic document by accessing the file having the structure information, the attribute information, and the content so that the document management file does not need to access more than one file to present the electronic document. Thus, Applicant submits that the Examiner has failed to establish a *prima facie* case of obviousness with respect to claims 13, 19, and 26.

New claims 27, 28, and 29 have been added to capture features disclosed in the specification, but not previously recited in the independent claims. Claim 27 recites a method of composing an electronic document that is generated by a word processing application. Claim 28 recites a method of composing an electronic document that is generated by an electronic mail application. Claim 29 recites a method of composing an electronic document that is generated by a web browser application. These features in combination with the other features of the claims are not disclosed by W3C.

Having addressed each of the foregoing rejections, it is respectfully submitted that a full and complete response has been made to the Office Action and, as such, the present application is in condition for allowance. Notice to that effect is respectfully requested. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

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Respectfully submitted,



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